

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as currently amended and in light of the following discussion, is respectfully requested.

Claims 1, 3-12, 14-30, and 32-36 and 38-40 are pending. Claims 2, 13, 31, and 37 were canceled in a previous amendment. The title and Claims 38-40 are amended. No claims are newly added. Support for the amendments to Claims 38 and 40 is self-evident. Support for the amendment to Claim 39 can be found in original Claim 12, for example. No new matter is added.

In the outstanding Office Action, the title of the invention was objected to as insufficiently descriptive. Claims 38 and 40 were objected to for minor informalities. Claims 39-40 were rejected under 35 U.S.C. § 103(a) as obvious over Yasui et al. (U.S. Patent No. 6,567,643, herein "Yasui") in view of Kawai et al. (U.S. Patent No. 6,021,286, herein "Kawai"). Claims 1, 3-12, 14-30, 32-36, and 38 were allowed

Applicants note with appreciation the indication that Claims 1, 3-12, 14-30, 32-36, and 38 are allowed.

Regarding the objection to the title as not descriptive, the title is amended to include more descriptive terms. Accordingly, Applicants respectfully submit that the objection to the title is overcome.

Regarding the objection to Claims 38 and 40 for minor informalities, Claims 38 and 40 are amended to recite the terminology recommended in the outstanding Office Action. Accordingly, Applicants respectfully submit that the objection to Claims 38 and 40 is overcome.

Regarding the rejection of Claim 39 as obvious over Yasui in view of Kawai, that rejection is respectfully traversed by the present response.

Amended Claim 39 recites, in part:

high-resistance backup rollers having a volumetric resistivity of at least $10^9 \Omega \cdot \text{cm}$, contacting an inside surface of said intermediate image transfer belt, wherein said intermediate image transfer belt has a surface resistivity of $10^{12} \Omega \cdot \text{cm}$ or above wherein said backup rollers, constituting auxiliary rollers for forming nips for image transfer, each are positioned close to the nip of a particular image transfer position at an upstream side of said nip in a direction of movement of said image transfer belt.

Accordingly, the backup rollers have a volumetric resistivity of at least $10^9 \Omega \cdot \text{cm}$.

The outstanding Office Action points to auxiliary member (325) of Yasui for the feature of backup rollers.¹ However, the auxiliary member (325) of Yasui is not disclosed as having a volumetric resistivity of at least $10^9 \Omega \cdot \text{cm}$. Rather, auxiliary members (325) are merely described in terms of their physical relationship with the belt (321) and coil spring (326) and are not disclosed as having the above-noted resistivity.² Accordingly, Yasui fails to disclose at least this feature recited in amended Claim 38.

The outstanding Office Action relies on rollers (8-1), (8-2), (8-3), and (8-4) of Kawai for rollers that contact the inside of the transfer belt. However, to the extent that Kawai comments on the electrical properties of any of rollers (8-1), (8-2), (8-3), and (8-4), Kawai requires the rollers to be conductive. Kawai states:

The endless belt 7 forms an endless course by means of rollers 8-1 through 8-4. The recording paper 2 is carried on the outside of the side of the endless course of the endless belt 7 formed by the rollers 8-1 and 8-2. An electric charging roller 9 is provided opposite to the roller 8-1, and the recording paper 2 and the endless belt 7 are sandwiched between the roller 8 and the electric charging roller 9.

The recording paper 2 and the endless belt 7 are electrically charged by the roller 8-1 and the electric charging roller 9. Thereby, the recording paper 2 is adhered to the endless belt 7 electrostatically. Thereby, the recording paper 2 moves with the endless belt 7 as the endless belt 7 moves.³

¹ Outstanding Office Action at 3.

² Yasui col. 16, lines 31-34.

³ Kawai, col. 7, lines 14-26 (emphasis added).

Accordingly, the roller (8-1) is used to **charge** the endless belt (7) and is therefore conductive.

Kawai further states:

With reference to FIG. 3, when passing under the electrostatic recording units 10-1 through 10-4, the toner images of the colors of the electrostatic recording units 10-1 through 10-4 are transferred to the recording paper 2 so as to be overlaid on each other. Then, finally, the full-color toner image is recorded on the recording paper. **After that, the recording paper 2 having the full-color toner image formed thereon is supplied to the roller 8-2.**

The electric charges of the recording paper 2 and the endless belt 7 are removed by the roller 8-2. Thereby, the recording paper 2 electrostatically adhered to the endless belt 7 is released from the endless belt 7. Thus, when the endless belt 7 moves downward by the roller 8-2, the recording paper 2 is removed from the endless belt 7, and, then, is supplied to a fixing unit 11.⁴

Accordingly, Kawai uses the roller (8-2) to **discharge** the endless belt and recording paper.

Thus, roller (8-2) is required to be conductive.

The electrical properties of rollers (8-3) and (8-4) are not discussed in Kawai. Thus, Kawai does not disclose that any of the rollers (8-1), (8-2), (8-3), and (8-4) has a volumetric resistivity of at least $10^9 \Omega \cdot \text{cm}$ as recited in amended Claim 39. Accordingly, Applicants respectfully submit that no reasonable combination of Yasui with Kawai would include all of the features recited in amended Claim 39, and the rejection of Claim 39 is overcome for at least the reasons discussed above.

Regarding the rejection of independent Claim 40 as obvious over Yasui in view of Kawai, that rejection is respectfully traversed by the present response.

Independent Claim 40 recites, in part:

a high-resistance backup roller, contacting an inside surface of said intermediate image transfer belt, wherein said image carrier comprises a plurality of image carriers each being assigned to a particular color, and said high-resistance backup roller, constituting an auxiliary roller for forming a nip for image transfer, comprises a plurality of high-resistance backup-rollers each being positioned close to said nip at an upstream side

⁴ Kawai, col. 8, lines 28-42 (emphasis added).

of said nip in a direction of movement of said intermediate image transfer belt and having a volumetric resistivity of at least $10^9 \Omega \cdot \text{cm}$.

Accordingly, as is the case with Claim 39 above, the high resistance backup roller recited in Claim 40 has a volumetric resistivity of at least $10^9 \Omega \cdot \text{cm}$.

The volumetric resistivity of the backup roller is not discussed in the rejection of Claim 40, and neither of the references cited in the obviousness rejection of Claim 40 discloses backup rollers with a volumetric resistivity of $10^9 \Omega \cdot \text{cm}$. As discussed above, Yasui makes no mention of the resistivity of its rollers, and Kawai describes conductive rollers.

Accordingly, Applicants respectfully submit that independent Claim 40 patentably distinguishes over any reasonable combination of Yasui and Kawai for at least the reasons discussed above.

Consequently, in light of the above discussion and in view of the present amendments, the present application is believed to be in condition for allowance, and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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